

DECLARATION OF WILLIAM K. HANAGAMI

I, WILLIAM K. HANAGAMI, declare as follows:

1. I am over the age of 18 and I know all of the following facts to be true based upon my own personal knowledge. If called upon, I could and would competently testify to the truth of the following facts.

2. I am a member of Hanagami Law, A.P.C. and am one of the attorneys of record for plaintiff and relator Leiasa Beckham (Relator) in the above-captioned action, and am duly licensed to practice law in the State of California and before the United States District Court for the Northern District of California.

3. I make this declaration in support of my and Byron T. Ball's (collectively, "Counsel") motion to conditionally withdraw as counsel of record for Relator.

4. During August 2024, a dispute arose between Relator and me while preparing a court-ordered updated settlement conference brief (Doc. 110), the result of which I determined that I could no longer represent Relator in this action consistent with the Rules of this Court. Subsequently, Relator provided Counsel with written Authorization to engage in Counsel's recommended settlement discussions with defendants subject to certain limitations. However, Relator engaged in activities that impeded Counsel's ability to engage in such negotiations, and recently made statements indicating that Relator would not consummate such authorized settlement if achieved. This has resulted in a breakdown in communications between Counsel and Realtor, such that I believe that I can no longer represent the best interests of Relator in this action consistent with my legal and ethical obligations.

5. On October 3, 2024, I notified defense counsel to Counsel's intention to file this motion to conditionally withdraw as counsel of Relator and to request that pending court deadlines be taken off-calendar. I am advised by defense counsel that they take no position on the motion, but believe that allowing Relator 30 days to obtain replacement counsel is more appropriate.

7. This motion and supporting papers will be served upon Relator at her mailing address reflected on the attached Proof of Service By Mail, which address was recently confirmed by Relator. Courtesy copies of this motion and supporting papers are also being emailed to Relator at her last known email address today.

/s/William K. Hanagami
William K. Hanagami